

Teri B. Himebaugh, Esq.  
220 Stallion Lane  
Schwenksville, PA 19473  
PA ID 53603

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

COREY WHITE	:	
Plaintiff	:	
	:	
v.	:	Civil Action No. 02-CV-04066
	:	
CITY OF PHILADELPHIA, et. al.	:	
	:	
Defendants	:	

**PLAINTIFF'S PROPOSED JURY INTERROGATORIES**

1. Do you find, by a preponderance of the evidence, that any of the following Defendants violated Plaintiff, Corey White's, constitutional rights by using greater force on him than was reasonably necessary during the course of his arrest?

PO Michael Iannacone	YES	_____	NO	_____
PO Eric Blocker	YES	_____	NO	_____
PO Alfonse Johnson	YES	_____	NO	_____
PO Claudia McDonald	YES	_____	NO	_____
PO Jose Roman	YES	_____	NO	_____
  
2. Do you find, by a preponderance of the evidence that any of the following Defendants violated Plaintiff, Corey White's, common law rights by assaulting and battering him during the course of his arrest?

PO Michael Iannacone	YES	_____	NO	_____
PO Eric Blocker	YES	_____	NO	_____
PO Alfonse Johnson	YES	_____	NO	_____

PO Claudia McDonald YES \_\_\_\_\_ NO \_\_\_\_\_

PO Jose Roman YES \_\_\_\_\_ NO \_\_\_\_\_

3. If you answered, "Yes" to question number 1 and/or number 2, do you also find, by a preponderance of the evidence, that the conduct of any of the following Defendants caused Corey White to suffer damages as a result of their use of force/assault and battery?

PO Michael Iannacone YES \_\_\_\_\_ NO \_\_\_\_\_

PO Eric Blocker YES \_\_\_\_\_ NO \_\_\_\_\_

PO Alfonse Johnson YES \_\_\_\_\_ NO \_\_\_\_\_

PO Claudia McDonald YES \_\_\_\_\_ NO \_\_\_\_\_

PO Jose Roman YES \_\_\_\_\_ NO \_\_\_\_\_

4. If you answered, "Yes" to question number 3, what is the amount of compensatory damages, if any, that you find will reasonably compensate the Plaintiff, Corey White, for the use of force/assault and battery upon him by each Defendant officer that you found violated Plaintiff's rights?

PO Michael Iannacone \$\_\_\_\_\_

PO Eric Blocker \$\_\_\_\_\_

PO Alfonse Johnson \$\_\_\_\_\_

PO Claudia McDonald \$\_\_\_\_\_

PO Jose Roman \$\_\_\_\_\_

5. Do you find, by a preponderance of the evidence, that any of the following Defendants violated Plaintiff, Corey White's, constitutional rights by failing to intervene and prevent other officers from harming Plaintiff during the arrest?

PO Michael Iannacone YES \_\_\_\_\_ NO \_\_\_\_\_

PO Eric Blocker YES \_\_\_\_\_ NO \_\_\_\_\_

PO Alfonse Johnson YES \_\_\_\_\_ NO \_\_\_\_\_

PO Claudia McDonald	YES	_____	NO	_____
---------------------	-----	-------	----	-------

PO Jose Roman	YES	_____	NO	_____
---------------	-----	-------	----	-------

6. If you answered, "Yes" to question number 5, do you also find, by a preponderance of the evidence, the conduct of any of the following Defendants caused Corey White to suffer damages as a result of their failure to intervene?

PO Michael Iannacone	YES	_____	NO	_____
----------------------	-----	-------	----	-------

PO Eric Blocker	YES	_____	NO	_____
-----------------	-----	-------	----	-------

PO Alfonse Johnson	YES	_____	NO	_____
--------------------	-----	-------	----	-------

PO Claudia McDonald	YES	_____	NO	_____
---------------------	-----	-------	----	-------

PO Jose Roman	YES	_____	NO	_____
---------------	-----	-------	----	-------

7. If you answered, "Yes" to question number 6, what is the amount of compensatory damages, if any, as to each Defendant that you found in question number 6 failed to intervene, that you find will reasonably compensate the Plaintiff, Corey White?

PO Michael Iannacone	\$_____
----------------------	---------

PO Eric Blocker	\$_____
-----------------	---------

PO Alfonse Johnson	\$_____
--------------------	---------

PO Claudia McDonald	\$_____
---------------------	---------

PO Jose Roman	\$_____
---------------	---------

8. Do you find, by a preponderance of the evidence, that any of the following Defendants violated Plaintiff, Corey White's, constitutional rights by acting in concert or conspiring to use greater force than was reasonably necessary?

PO Michael Iannacone	YES	_____	NO	_____
----------------------	-----	-------	----	-------

PO Eric Blocker	YES	_____	NO	_____
-----------------	-----	-------	----	-------

PO Alfonse Johnson	YES	_____	NO	_____
--------------------	-----	-------	----	-------

PO Claudia McDonald	YES	_____	NO	_____
---------------------	-----	-------	----	-------

PO Jose Roman YES \_\_\_\_\_ NO \_\_\_\_\_

9. If you answered, "Yes" to question number 8, do you also find, by a preponderance of the evidence, that the conduct of any of the Defendants acting in concert or conspiracy caused Plaintiff, Corey White, to suffer damages as a result of excessive force?

PO Michael Iannacone YES \_\_\_\_\_ NO \_\_\_\_\_

PO Eric Blocker YES \_\_\_\_\_ NO \_\_\_\_\_

PO Alfonse Johnson YES \_\_\_\_\_ NO \_\_\_\_\_

PO Claudia McDonald YES \_\_\_\_\_ NO \_\_\_\_\_

PO Jose Roman YES \_\_\_\_\_ NO \_\_\_\_\_

10. If you answered, "Yes" to question number 9, what is the amount of compensatory damages, if any, that you find will reasonably compensate the Plaintiff, Corey White, for the conspiracy to use excessive force upon?

PO Michael Iannacone \$\_\_\_\_\_

PO Eric Blocker \$\_\_\_\_\_

PO Alfonse Johnson \$\_\_\_\_\_

PO Claudia McDonald \$\_\_\_\_\_

PO Jose Roman \$\_\_\_\_\_

11. If you find that any of the Defendants' conduct toward the Plaintiff, Corey White, caused actual damages and was maliciously or wantonly done, what is the amount of punitive damages, if any, you find will reasonably punish the Defendants for their individual conduct?

PO Michael Iannacone \$\_\_\_\_\_

PO Eric Blocker \$\_\_\_\_\_

PO Alfonse Johnson \$\_\_\_\_\_

PO Claudia McDonald \$\_\_\_\_\_

PO Jose Roman \$\_\_\_\_\_

**YOU HAVE NOW COMPLETED YOUR DELIBERATIONS. PLEASE SIGN  
AND DATE THIS FORM AND RETURN TO THE COURTROOM.**

DATE: \_\_\_\_\_

BY: \_\_\_\_\_

**Foreperson**